

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Carla Gericke,

Plaintiff

v.

Case No: 1:11-cv-00231-SM
JURY TRIAL DEMANDED

Town of Weare, et al.,

Defendants.

**ASSENTED-TO MOTION FOR LEAVE OF WITHDRAWAL OF
REPRESENTATION FOR SGT. JOSEPH KELLEY**

NOW COMES counsel for the Weare Police Defendants, and files this assented-to motion to withdrawal legal representation on behalf of only Sgt. Joseph Kelley, and says as follows:

1. Attorney Corey Belobrow of Concord, New Hampshire, will be representing Sgt. Joseph Kelley in this matter. Attorney Belobrow will file his appearance on behalf of Sgt. Joseph Kelley if and when this motion is granted by the Court permitting the undersigning to withdraw as legal representation for Sgt. Joseph Kelley only.

2. There are no pending motions before the Court, but a trial date of September 18, 2012 has been set.

3. Granting this motion will not prejudice Sgt. Joseph Kelley or any other parties to the action. Nor will granting this motion postpone or delay any scheduled matters in this matter.

4. Sgt. Joseph Kelley has been notified of this motion as has Attorney Corey Belobrow. Sgt. Kelley's business address is c/o Weare Police Department, 144 North Stark Highway, Weare, NH 03281.

WHEREFORE, the undersigned respectfully requests leave of court to withdraw legal representation on behalf of Sgt. Joseph Kelley only.

Respectfully submitted,

**TOWN OF WEARE, NH;
WEARE POLICE CHIEF GREGORY C. BEGIN;
WEARE POLICE LIEUTENANT JAMES J.
CARNEY; WEARE POLICE SERGEANT JOSEPH
KELLEY, WEARE POLICE OFFICER BRANDON
MONTPLAISIR, Individually and Officially**

By Their Attorneys,

GALLAGHER, CALLAHAN & GARTRELL, P.C.
214 N. Main Street
P.O. Box 1415
Concord, NH 03302-1415
(603)228-1181
(603)224-7588 (facsimile)

March 20, 2012
Date

/s/ Charles P. Bauer
Charles P. Bauer, Esquire (NH Bar #208)

LOCAL RULE 7.1

I, Charles P. Bauer, hereby certify that Attorney Stephen T. Martin, counsel for Plaintiff, assented to this motion. Further, I certify that granting this motion will not postpone or delay any scheduled matters in the pending action.

March 20, 2012
Date

/s/ Charles P. Bauer
Charles P. Bauer, Esquire (NH Bar #208)

CERTIFICATE OF SERVICE

I, Charles P. Bauer, hereby certify that a copy of the foregoing was sent to Stephen T. Martin, Esquire via ECF and Corey Belobrow via email at coreyb@usa.net.

March 20, 2012
Date

/s/ Charles P. Bauer
Charles P. Bauer, Esquire (NH Bar #208)